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Lone Star Gas Company

301 S Harwood • • Dallas, Texas 75201 5696

ELLEN WEAVER  
Senior Attorney

LEGAL DEPARTMENT

91 NOV 25 AM 9:01

November 20, 1991

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RSPA-98-4868-7

Dockets Unit  
Room 8417  
Research and Special  
Programs Administration  
U.S. Department of Transportation  
400 Seventh, S.W.  
Washington, D.C. 20590

Re: Gas Gathering Line Definition  
Docket No. PS-122, Notice 1

Dear Sir:

Please find enclosed for filing in the referenced docket  
duplicate sets of the written comments of Lone Star Gas Company.

Yours truly,

  
Ellen Weaver

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cc: Mr. R.P. Buckner

UNITED STATES OF AMERICA  
DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION

GAS GATHERING LINE  
DEFINITION

§  
§

DOCKET NO. PS-122  
NOTICE 1

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WRITTEN COMMENTS OF LONE STAR GAS COMPANY

Lone Star Gas Company (Lone Star), a Division of ENSERCH Corporation, files these comments in response to the Notice of Proposed Rulemaking published in the Federal Register on September 25, 1991.

I.

Lone Star Gas Company is a Division of ENSERCH Corporation. ENSERCH Corporation is a corporation duly organized and existing under the laws of the State of Texas. Lone **Star's** principal business address is 301 South Harwood Street, Dallas, Texas 75201.

II.

Lone Star owns and operates natural gas transmission lines, gathering lines, compressor stations, distribution systems, and related properties by which it transports natural gas in intrastate **commerce** within the State of Texas and distributes same to domestic, commercial, and industrial customers within these States. Lone Star is subject to the pipeline safety jurisdiction of the Texas Railroad Commission. Therefore, Lone Star is affected by changes in the provisions of 49 **C.F.R.** Part 192.

### III.

As proposed, the rule defines gathering lines **generally** to include pipelines or part of a connected series of **pipelines used** to transport gas from a well or the first production facility where gas is separated from produced hydrocarbons to the inlet of the first natural gas processing plant used to remove liquefied petroleum gases or other natural gas liquids. While Lone Star understands the intent of the RSPA to preclude from inclusion in the processing definition activities such as odorization and the addition of propane to natural gas, the gas processing plant limitation is too restrictive. The gas processing plant standard eliminates from inclusion as a gathering line those pipelines carrying gas that does not require **"processing"** but that requires **"treating"** in order to become pipeline quality. Therefore, Lone Star proposes that subparagraph (1) of proposed rule §192.3 be revised as follows:

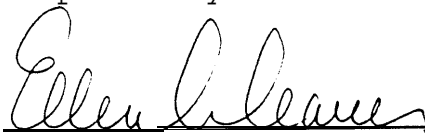
- (1) The inlet of the first natural gas processing plant used to remove liquefied petroleum gases or other natural liquids or the first natural gas treating plant used to remove inert gases or other non-marketable contaminants.

Lone Star submits that the above revision is appropriate because no distinction should be made in defining the term "gathering line" between a pipeline upstream of a processing plant and a pipeline upstream of a treating plant whose function is to remove inert gases or other non-marketable contaminants.

Conclusion

Lone Star Gas Company recognizes the effort of the RSPA in developing an appropriate gathering line definition. Lone Star submits, however, that the inclusion in the gathering line definition of the above proposed revision would result in a positive improvement in the definition.

Respectfully submitted,

  
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Ellen Weaver, Attorney

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